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11 *Attorneys for Defendant Ronald Craig Ilg*

12 UNITED STATES DISTRICT COURT
13 EASTERN DISTRICT OF WASHINGTON

14 UNITED STATES OF AMERICA,

15
16 Plaintiff,

17 v.

18
19 RONALD CRAIG ILG,

20 Defendant.
21

Case No. 2:21-cr-00049-WFN

**DECLARATION OF ANDREW
M. WAGLEY IN SUPPORT OF
DEFENDANT'S PRETRIAL
MOTIONS**

22
23 I, Andrew M. Wagley, do hereby declare the following is true and correct
24 to the best of my knowledge:
25

- 26 1. I am an attorney of record for the Defendant, Ronald C. Ilg, MD
27
28 ("Dr. Ilg"), in this matter. I make this Declaration in support of the
29
30 Defendant's Pretrial Motions filed contemporaneously herewith.
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- 1 2. Attached hereto as **Exhibit A** is a true and correct copy of the
2
3 Application for Search Warrant authored by FBI Special Agent Eric
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5 Barker on April 9, 2021. This Application is explicitly “for
6
7 information related to the certain Bitcoin Transactions set forth in
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9 Attachment A, which are stored on premises controlled by
10 Coinbase.” This Application was propounded by the Government
11 during discovery in this matter.
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- 13 3. Attached hereto as **Exhibit B** is a true and correct copy of the Search
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15 and Seizure Warrant issued by United States Magistrate Judge John
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17 T. Rodgers on April 9, 2021. This Search Warrant is “for
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19 information related to the certain Bitcoin Transactions as further
20
21 described in Attachment A, which are stored on premises controlled
22 by Coinbase.” This Search Warrant was propounded by the
23 Government during discovery in this matter.
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- 25 4. Attached hereto as **Exhibit C** is a true and correct copy of a
26
27 transcript of the interview of Dr. Ilg by FBI Agents Eric Barker and
28
29 Christian Parker at the Spokane International Airport on April 11,
30
31 2021. This audio was transcribed from a recording produced by the
32 Government during discovery in this matter. The audio was

1 transcribed by Cindy J. Chatterton, CCR of Chatterton Court
2
3 Reporting and is certified on page 71.
4

5 5. Attached hereto as **Exhibit D** is a true and correct copy of an article
6 from the Department of Justice's website. This article is entitled:
7 "Beverly Hills Man Arrested on Federal Charges of Attempting to
8 Hire Hitman to Murder One-Time Girlfriend Who Had Rebuffed
9 Him." I accessed and printed this article on February 28, 2022 from
10 the following link: [https://www.justice.gov/usao-cdca/pr/beverly-](https://www.justice.gov/usao-cdca/pr/beverly-hills-man-arrested-federal-charges-attempting-hire-hitman-murder-one-time)
11 hills-man-arrested-federal-charges-attempting-hire-hitman-murder-
12 one-time.
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18 6. Attached hereto as **Exhibit E** is a true and correct copy of an April
19 20, 2021 FBI Report authored by Agents Parker and Barker. This
20 FBI Report was propounded by the Government during discovery in
21 this matter.
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25 7. Pursuant to Fed. R. Civ. P. 5.2, Fed. R. Crim. P. 49.1, and Eastern
26 District of Washington ECF filing requirements, my office has
27 redacted the social security numbers, dates of birth, names of minor
28 children, financial account numbers, and home addresses in the
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30
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1 Exhibits herein. We have also redacted the full names of Victim 1,
2
3 Victim 2, and Witness 1.

4
5 I hereby declare the foregoing is true and correct under penalty of perjury
6 of the laws of the State of Washington and United States of America.
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8 EXECUTED this 28th day of February, 2022 in Spokane, Washington.
9

10 By: /s/ Andrew M. Wagley
11 Andrew M. Wagley
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CERTIFICATE OF SERVICE

I hereby certify that on the 28th day of February, 2022, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF System, which will send notification of such filing to all attorneys of record in this matter.

EXECUTED in Spokane, Washington this 28th day of February, 2022.

By: /s/ Jodi Dineen
Jodi Dineen, Paralegal